

EXHIBIT A

Ray Mort

From: Ray Mort
Sent: Tuesday, February 2, 2021 8:58 PM
To: John Johnson
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com; Jeffrey Mok; David Hoffman; Michael Autuoro
Subject: Re: WSOU Investments LLC v. TP-Link Technology Co., Ltd., Case Nos. 6:20-cv-01012-ADA to 6:20-cv-01022-ADA: Objections to Document Subpoena [Hague Motion/Case Scheduling Issues]

John,

Also, please advise if you will accept service for TP-Link.

Thanks,

Ray

On Feb 1, 2021, at 7:42 PM, John Johnson <jjohnson@fr.com> wrote:

Ray, what do you mean by “attorneys involvement”? And also, “close out the issue of whether due process was met?” The motion raised legal issues and does not implicate any fact disputes. -John

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: Ray Mort <raymort@austinlaw.com>
Sent: Monday, February 01, 2021 7:40 PM
To: John Johnson <jjohnson@fr.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman <Hoffman@fr.com>; Michael Autuoro <Autuoro@fr.com>
Subject: Re: WSOU Investments LLC v. TP-Link Technology Co., Ltd., Case Nos. 6:20-cv-01012-ADA to 6:20-cv-01022-ADA: Objections to Document Subpoena [Hague Motion/Case Scheduling Issues]

No.

We need a stipulation regarding the attorneys involvement first. Or we need to do additional discovery to close out the issue of whether due process was met with service on the attorneys or the US sub.

On Feb 1, 2021, at 5:51 PM, John Johnson <jjohnson@fr.com> wrote:

Ray, can we confirm that you can get your opposition to our motion by February 11? -
John

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: John Johnson
Sent: Friday, January 29, 2021 6:19 PM
To: Ray Mort <raymort@austinlaw.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com;
gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman
<Hoffman@fr.com>; Michael Autooro <Autooro@fr.com>
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Let's discuss this, as I'm not sure I'm understanding. Our motion is based on the premise that the Hague Convention is mandatory (and that substitute service was not available), so not sure how we can stipulate that we got "served" via substitute "service." We can certainly stipulate that Plaintiff did what it did (e.g., sent an email) we did something (e.g., received an email with some papers), but we can't stipulate that those facts satisfied the law on service of process. That's the whole point of our motion, we are saying that what Plaintiff did is not legally valid.

-John

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: Ray Mort <raymort@austinlaw.com>
Sent: Friday, January 29, 2021 5:16 PM
To: John Johnson <jjohnson@fr.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com;
gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman
<Hoffman@fr.com>; Michael Autooro <Autooro@fr.com>
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Understood.

We may also seek a stipulation regarding the service as well. We will draft it up and send it to you early next week. If your client doesn't want to stipulate that it was served via the substitute service, then we may need to do a short depo. We understand the defendant's position that the substitute service should not have been authorized. We just want to make sure there is no dispute that they were served according to the Court's order.

- Ray

<image001.jpg>

RAYMOND W. MORT, III
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From: John Johnson <jjohnson@fr.com>
Sent: Friday, January 29, 2021 4:09 PM
To: Ray Mort <raymort@austinlaw.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman <Hoffman@fr.com>; Michael Autooro <Autooro@fr.com>
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Ok, let us know - I had proposed a week out in view of the comment that Plaintiff didn't serve the jurisdictional discovery to delay our motion, and it seems like a reasonable time frame given that our motion does not involve contested fact issues, and also, because you've been through this Hague stuff a number of times before. But if you need the full two weeks from the time we served our discovery responses, that's fine too. Glad we could figure out the jurisdictional stuff, and it would be good if we can confirm the briefing schedule as well.

-John

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: Ray Mort <raymort@austinlaw.com>
Sent: Friday, January 29, 2021 4:42 PM
To: John Johnson <jjohnson@fr.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman <Hoffman@fr.com>; Michael Autooro <Autooro@fr.com>
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John,

Doubtful we will have our response done by next Friday. We are reviewing as discussed.

Agreed with the remaining positions.

- Ray

<image001.jpg>

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From: John Johnson <jjohnson@fr.com>
Sent: Friday, January 29, 2021 2:05 PM
To: Ray Mort <raymort@austinlaw.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com;
gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman
<Hoffman@fr.com>; Michael Autooro <Autooro@fr.com>
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[-Steve Smerek]

Ray,

On the Hague Motion briefing, please let us know if one week out works for opposing our motion. That would bring the opposition brief to February 5. Let me know if that works.

As for the case schedule, we understand that Plaintiff opposes any modification to the Court's standard schedule. (We had proposed on our call consideration of a deferred schedule to allow our motion to be briefed and considered first, before contentions). Also, you confirmed that Plaintiff does not agree with any stay of the schedule while the Hague motion, and will oppose any motion on it.

Thanks. -John

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: John Johnson
Sent: Friday, January 29, 2021 2:54 PM
To: ssmerek@foley.com; Ray Mort <raymort@austinlaw.com>
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com;
gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; David Hoffman

<Hoffman@fr.com>; Michael Autooro <Autooro@fr.com>

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Ray and I spoke today about jurisdictional discovery and it looks like we can short circuit this. TP-Link China does not contest that it got the complaints shortly after Plaintiff filed, as explained in its interrogatory responses (attached).

Ray, I will reach out separately about Hague Motion briefing that we discussed.

Thanks. -John

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: ssmerek@foley.com <ssmerek@foley.com>

Sent: Tuesday, January 26, 2021 9:34 PM

To: John Johnson <jjohnson@fr.com>; Ray Mort <raymort@austinlaw.com>;

aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com

Cc: Jeffrey Mok <jmok@fr.com>; David Hoffman <Hoffman@fr.com>

Subject: RE: WSOU Investments LLC v. TP-Link Technology Co., Ltd., Case Nos. 6:20-cv-01012-ADA to 6:20-cv-01022-ADA: Objections to Document Subpoena

Thank you. Please keep me posted.

Regards,

Stephen R. Smerek

Foley & Lardner LLP

555 South Flower Street / Suite 3300

Los Angeles, CA 90071-2418

Direct: (213) 972-4508

Mobile: (213) 304-2748

[Visit Foley.com](http://VisitFoley.com)

<image002.jpg>

From: John Johnson <jjohnson@fr.com>

Sent: Tuesday, January 26, 2021 12:10 PM

To: Ray Mort <raymort@austinlaw.com>; Smerek, Stephen R. <ssmerek@foley.com>;

aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com

Cc: Jeffrey Mok <jmok@fr.com>; David Hoffman <Hoffman@fr.com>

Subject: RE: WSOU Investments LLC v. TP-Link Technology Co., Ltd., Case Nos. 6:20-cv-01012-ADA to 6:20-cv-01022-ADA: Objections to Document Subpoena

**** EXTERNAL EMAIL MESSAGE ****

All – Ray and I are planning to chat soon to see if we can short circuit all of this.

John T. Johnson :: Fish & Richardson P.C. :: 212 641 2202

From: Ray Mort <raymort@austinlaw.com>
Sent: Friday, January 22, 2021 7:32 PM
To: ssmerek@foley.com
Cc: aprice@dinovoprice.com; cgoodpastor@dinovoprice.com; gdonahue@dinovoprice.com; Jeffrey Mok <jmok@fr.com>; John Johnson <jjohnson@fr.com>; David Hoffman <Hoffman@fr.com>
Subject: Re: WSOU Investments LLC v. TP-Link Technology Co., Ltd., Case Nos. 6:20-cv-01012-ADA to 6:20-cv-01022-ADA: Objections to Document Subpoena

[This email originated outside of F&R.]

Stephen,

Please let us know if you are available to meet and confer in these issues before we file a motion to compel.

Thanks,

Ray

On Jan 22, 2021, at 6:19 PM, ssmerek@foley.com wrote:

TO: All counsel of record in the above-referenced actions –

Attached please find Foley & Lardner LLP's Objections to Document Subpoena to Foley & Lardner LLP.

Regards,

Stephen R. Smerek
Foley & Lardner LLP
555 South Flower Street / Suite 3300
Los Angeles, CA 90071-2418
Direct: (213) 972-4508
Mobile: (213) 304-2748

Visit Foley.com
<image001.jpg>

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<Objections to Subpoena.pdf>

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